

#### Remedial Actions at Site:

The site was surveyed prior to expansion in order to separate the other landfill areas from the area identified as containing hazardous radioactive wastes.

The site was placed on the U.S. Environmental Protection Agency's (EPA) National Priorities List on October 26, 1989, mandating that the EPA conduct response actions at the site. After negotiating with the Potentially Responsible Parties (PRPs), an Administrative Order on Consent (AOC) was signed in March 1993 to conduct a Remedial Investigation/Feasibility Study (RI/FS) of the radiologically contaminated portions of the landfill (Operable Unit 1). The responding PRPs include Cotter Corporation; Laidlaw Waste Systems, Inc.; Bridgeton Landfill, LLC; Rock Road Industries, Inc.; and the U.S. Department of Energy. Bridgeton Landfill and the EPA negotiated a second AOC to perform an RI/FS for the non-radiological waste portions of the landfill (Operable Unit 2). It was executed in December 1994.

A Remedial Investigation (RI) report, baseline risk assessment, and Feasibility Study (FS) have been completed for Operable Unit 1. It was approved in May 2006. The RI report revealed that radionuclides are present in a dispersed manner throughout the upper part of the landfill deposits. Erosion of surface soil and subsequent sediment transport has resulted in off-site migration of radionuclides from Areas 1 and 2. However, the levels of radionuclides detected in groundwater beneath and adjacent to Areas 1 and 2 are generally below the MCL with some slightly above. The FS evaluated potential remedial options consistent with the procedures set forth in the National Contingency Plan (NCP) and guidance for "Presumptive Remedy for CERCLA Municipal Landfill Sites".

Similarly, a RI, baseline risk assessment, and FS have been completed to evaluate potential remedial alternatives for Operable Unit 2. It was approved in June 2006. EPA has prepared a Proposed Plan for both Operable Units (OU's), which was released on June 14, 2006 and public meetings were held in June and September 2006. The EPA extended the public comment period to December 31, 2006 in response to requests from St. Louis County and local elected officials. A Record of Decision (ROD) for both OU's was targeted for September 2007, but was delayed to address public concern. EPA opened the public comment period again on March 27, 2008 with a third public meeting. This third meeting came about as a result of a letter submitted to EPA from Senator Kit Bond's office and concerns from the Mayor's office and local activist groups over flood control and groundwater protection. This comment period ended on April 9, 2008.

EPA signed the ROD and Responsiveness Summary for OU-1 on May 29, 2008. The Selected Remedy for OU-1 is to consolidate and contain radioactive materials in place using a modified engineered cover system with long-term groundwater monitoring, institutional controls, inspection, maintenance, and periodic reviews. EPA signed the ROD for OU-2 on July 25, 2008 which was similar to OU-1 ROD. The Selected Remedy for the OU-2 is containment in place using an engineered landfill cover system consistent with Missouri solid waste rules. ~~Public discontent persists over~~ Some members of the public oppose EPA's selected remedy for OU1.

Negotiations began with the Responsible Parties to initiate Remedial Design (RD) by an amendment to the existing AOC on October 16, 2008. A technical meeting was held between the PRPs, EPA and the Missouri Department of Natural Resources to discuss the draft RD Work Plans on January 22, 2009. The Missouri Department of Natural Resources submitted comments to the RD Work Plans on April 2, 2009. During the finalization of the Remedial Design Work Plans, interim work was planned to prepare for future remedial actions. These

included insitu testing of existing cap, clearing of vegetation, and a topographical survey. Only the existing cap testing has been initiated to date.

On April 2, 2009 the EPA Administrator received a letter from the Great Rivers Environmental Law Center requesting a reconsideration of the Selected Remedy for OU1. ~~EPA Headquarters is deliberating on their response to this request.~~In response to this request, EPA and the Responsible Parties are performing a Supplemental Feasibility Study to further evaluate two excavation remedies for OU1. The SFS workplan was approved on May 21, 2010, and the draft SFS report is due July 23, 2010. Review of the RD work plans is on hold while the SFS is being performed.